

SUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**03-MDL-1570(GBD)(SN)**

In re:

**TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001**

**NOTICE OF MOTION  
FOR LEAVE TO FILE  
IRAN NOTICES OF  
AMENDMENT NUNC  
PRO TUNC**

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This document relates to:

*Kim et al. v. Islamic Republic of Iran*, No. 18-CV-11870 (GBD) (SN);  
*DeRubbio et al. v. Islamic Republic of Iran*, No. 18-CV-05306 (GBD) (SN);  
*Kamardinova et al. v. Islamic Republic of Iran*, No. 18-CV-05339 (GBD) (SN);  
*Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN);  
*Jimenez et al. v. Islamic Republic of Iran*, No. 18-CV-11875 (GBD) (SN);  
*Rowenhorst et al. v. Islamic Republic of Iran*, No. 18-CV-12387 (GBD) (SN);  
*O'Neill et al., v. Islamic Republic of Iran*, No. 04-CV-01076 (GBD) (SN);  
*Aamoth et al. v. Islamic Republic of Iran*, No. 18-CV-12276 (GBD) (SN);  
*Abel et al. v. Islamic Republic of Iran*, No. 18-CV-11837 (GBD) (SN).

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law,  
Declaration of Jerry S. Goldman, Esq. and Proposed Order, along with the exhibits appended  
thereto, plaintiffs in the above-referenced matters, by and through their counsel, Anderson  
Kill P.C., and in accordance with F.R.C.P. 15, respectfully request that this Court grant  
Plaintiffs' Motion for Leave to File Iran Notices of Amendment *Nunc Pro Tunc* (attached hereto  
as Exhibits A – I) as of the respective date of judgment.

Dated: October 2, 2019

Respectfully submitted,

*/s/ Jerry S. Goldman*

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